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December 3, 2010

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VIA ELECTRONIC FILING

Marlene H. Dortch Secretary Federal Communications Commission 445 12th Street, SW Washington, DC 20554

Re: Petition of Puerto Rico Telephone Company, Inc. and Puerto Rico Telephone Larga Distancia, Inc. For Waiver of Section 64.1903 of the Commission's Rules, WC Docket No. 10-52

Dear Ms. Dortch:

On November 30, 2010, as counsel to Puerto Rico Telephone Company, Inc. ("PRT"), I spoke by telephone with William Kehoe, Senior Counsel, Competition Policy Division, and Pam Megna, Senior Economist, Wireline Competition Bureau, regarding the above-referenced proceeding. During the call, we discussed the competitive data available to PRT regarding the market for business telecommunications services in Puerto Rico.

Pursuant to 47 C.F.R. § 1.1206, please include this ex parte filing in the above-referenced dockets.

Sincerely yours

Bennett L. Ross

cc: William A. Kehoe III

Pam Megna